# Base Realignment and Closure Cleanup Team Meeting Minutes Former George Air Force Base, California 21 March 2006

On 21 March 2006, the George Air Force Base (GAFB) Remedial Project Managers group met at MWH's office in Sacramento, California. The following individuals attended the meeting.

Glenn Bruck
Jay Cass, P.E.
James Chang
U.S. Environmental Protection Agency
Regional Water Quality Control Board
U.S. Environmental Protection Agency

Kurt Condie, P.E MWH

Calvin Cox Booz Allen Hamilton

Gilbert Dimidjian MWH

William Harris, Ph.D., P.E. Air Force Real Property Agency

Bill Mabey, Ph.D Techlaw
Campbell McLeod CH2MHill
Sandra Ross, P.G. MWH

Susan Soloyanis, Ph.D., P.G. Mitretek Systems

Dale Vandagriff Air Force Real Property Agency

# 1.0 Administrative Topics

The Base Realignment and Closure Cleanup Team (BCT) meeting commenced at 1:15 p.m. at MWH's office in Sacramento, California. A sign-in sheet was circulated at the beginning of the meeting (**Attachment 1**).

The Air Force (AF) field support office will be relocating elsewhere on base in the near future. The AF will distribute the new address after the move is complete.

The Regional Water Quality Control Board (RWQCB) has lost some personnel and is requesting additional time to review documents.

#### Action Items

The AF stated only the active action items will be included in future slide presentations. All action items will continue to be tracked on paper and submitted with meeting minutes.

The action items were reviewed with the following comments (Attachment 2).

- Action Item #402: A schedule for property transfer will be provided to the BCT after an AF management meeting is held. The meeting is scheduled for next week.
- Action Item #404: The AF will formally issue a letter to the Local Reuse Authority (LRA) about lining the golf course pond. The AF anticipates issuing the letter soon, after AF legal has reviewed and added additional language.
- Action Item #419: The AF provided a copy of the Castle Air Force Base START-STOP document to the regulatory agencies in February. The AF will remove this task from the action item list.

- Action Items #420: The AF completed a bottom up review of the program and are prioritizing Corrective Action Plans (CAP) for Compliance Sites. The AF will issue a letter in the next couple of weeks.
- Action Item #421: The AF has a briefing slide today and will discuss what is and isn't funded for Dieldrin in groundwater. The AF will remove this task from the action item list.

# **Prior Meeting Minutes**

Prior meeting minutes were approved pending incorporation of U.S. Environmental Protection Agency (USEPA) comments, which were sent by e-mail (dated 15 March 2006). The AF distributed the proposed revisions and the USEPA approved the changes. The RWQCB will review meeting minutes and provide any comments tomorrow [RWQCB reviewed and approved meeting minutes on 22 March 2006]. The AF will incorporate USEPA comments and send the final meeting minutes by e-mail.

#### Document Review Schedule

The Document Review Schedule (DRS) was reviewed with the following comments noted (Attachment 3).

#### **Primary Documents**

- Document 102: Operable Unit (OU) 1 Northern Trichloroethylene (TCE) Plume Delineation Work Plan Comments were received from Victor Valley Wastewater Reclamation Authority (VVWRA) and the final work plan will be issued on 28 March 2006.
- Document 103: Funding for the OU 4 Proposed Plan and Record of Decision (ROD) has been awarded. The schedule is outlined in today's briefing slides.

#### Secondary Documents

- Document 214: Site OT-69 (SS083) Phase II Data Gaps Investigation and Preliminary Engineering Report RWQCB will issue comments by 10 April 2006.
- Document 215: Site CG-70 (FT082) Source Area Investigation and Preliminary Engineering Report RWQCB will issue comments by 10 April 2006.
- Document 219: Building 513 Chlordane Investigation Report Final report was issued on 17 March 2006. This document will be removed from the DRS.
- Document 226: Semiannual Report for Remedial Activities at Sites FT-19a, FT-19c, OT-51 and Landfills DP-03, DP-04, LF-12, LF-14, and the Southeast Disposal Area Draft report was submitted for regulatory review on 08 February 2006. No comments have been received from the USEPA or RWQCB.

# Compliance Documents

- Document 204: Facility 749 Closure Report The RWQCB still needs to review and provide a closure letter.
- Document 209: OU 2 Corrective Action Plan The AF's position is to complete multiple CAPs after the site investigations are finished for each Compliance Site, as presented in today's briefing slides.

- Document 227: Rail Road Fueling System Investigation and Removal Report The document was submitted to the City of Victorville Fire Department because underground storage tanks were involved. The city has indicated they will give acceptance for closure.
- Document 303: ST067b Data Gaps Investigation Work Plan The work plan has been funded and will be submitted to the regulatory agencies by 01 June 2006.

The AF will also include contractor names and provide separate lines for receipt of USEPA and RWQCB comments on future DRS.

The USEPA would like a tentative schedule for the OU 5 ROD. The AF will propose a schedule, but the document is not currently funded.

The USEPA thanked the AF for the thoroughness of the response to comments on the Draft Building 513 Chlordane Investigation Report.

# 2.0 Installation Restoration Program Operable Unit 1

#### Northern TCE Plume in Lower Aquifer – Sampling Locations and Field Work Update

VVWRA reviewed the Draft Final Work Plan and requested direct-push location #4 be moved because it was located above the new sludge pond discharge lines. The AF moved the sampling location to the west of direct-push location #4, to accommodate VVWRA's operational request.

The AF determined direct-push location #6 was on private property and obtaining access agreements would delay the start of the project by 90 to 120 days, so the location was moved to VVWRA property. If groundwater results from the Phase 1 work indicate additional delineation is necessary to the west, the AF will obtain the necessary access agreements for the private property.

Direct-push locations #4 and #5 are approximately 20 to 30 feet higher in the bluffs than originally planned and will provide more challenges for the direct-push rig. Locations #1, 2, and 3 did not change from what was originally proposed. The changes to the sampling locations will be documented in the Technical Memorandum following the first phase of work.

The AF performed a field visit to try and locate springs for sampling around VVWRA, as proposed in the work plan. There were no indications of springs in the area. The steep bluffs around VVWRA were also inspected for a water source, but none was found. A lot of vegetation was noted in the area, as well as wetlands containing 3 to 4 feet of standing water, which is attributed to the six million gallons per day discharged from VVWRA operations. Cottonwood trees were found a couple miles south of VVWRA with no visible signs of a water source. A water supply line was observed adjacent to the area and is suspected to be a source of water for the trees.

The RWQCB asked if it would be a good idea to start getting access agreements in place for the private property now. The AF will review the analytical results from the first phase of work and,

if further investigation is warranted, begin establishing access agreements. The AF will also need to identify funds to obtain any access agreements with the private property owner.

The AF will move forward on the first phase of work. Fieldwork is scheduled to begin the first week of April 2006. VVWRA has reviewed the work plan and has given approval to start work on the property. The AF will issue a Technical Memorandum following the initial investigation. This memorandum will document the results and include a recommendation for groundwater well location(s) or an additional investigation.

The RWQCB asked about a shallow auger to obtain a water sample in lieu of the spring sampling. If this sample is taken near the wetlands, the AF believes the results would just be representative of the water from the wetland and not groundwater moving into the area. If the sample is taken away from the wetlands, the results from locations #1, 2, and 3 should be just as representative as a shallow water sample.

# 3.0 Installation Restoration Program Operable Unit 3

#### Landfill Water Quality Protection Standards (WQPS) Update

The Draft WQPS document was submitted to the regulatory agencies on 8 February 2006. The AF recommended annual groundwater monitoring for the landfills since there is no indication of impact to groundwater from the landfills and semi-annual data is not providing additional benefit. Furthermore, the WQPS update recommended new compliance and control wells because of a change in the groundwater gradient due to VVWRA discharge operations. The RWQCB was concerned the landfill wells will only be sampled annually and would no longer be sampled on a semi-annual basis for the OU 1 TCE plume. The AF explained the wells would be run through the groundwater decision logic and would be sampled if the data were needed to define the OU 1 TCE plume. This change would not impact the OU 1 TCE groundwater monitoring program and would be treated independently with regard to the landfill compliance sampling. In addition, semi-annual water level measurements will still occur for the landfill wells.

The RWQCB stated they would review this report before focusing on any other outstanding documents. The AF will delay the basewide sampling event until a response on the Draft WQPS document is received from the RWQCB. The USEPA stated they were comfortable with the recommendations in the Draft WQPS report and concur with an annual sampling frequency for the landfill wells.

The USEPA asked why it was determined October would be the annual sampling event instead of April. The AF stated there is a higher probability of seeing responses from the landfills due to rain events in the winter.

The RWQCB requested a table describing what will be sampled at the landfills and what will be sampled this April on an annual basis. The AF agreed to provide the requested table.

# FT019 Status Update

The AF will not be submitting closure reports for Sites FT019a and FT019c. The AF wants to evaluate if they need to remove additional mass at Site FT019c. Results of the OU 1 groundwater modeling and vadose zone modeling suggest Site FT019c was an active TCE source to groundwater and there may be residual impact below 60 feet. No soil vapor extraction (SVE) wells were screened below 60 feet based on the data collected during the remedial investigation.

The AF believes updating the groundwater and vadose zone models over time will assist in the decision making process. With limited resources available, the AF has to prioritize how to spend the limited resources. The model will provide the lines of evidence needed to request and fund future work at Sites FT019a and FT019c, and the overall program. As it stands now, the AF has more requirements than resources.

The AF wants to link Site FT019c soil vapor data to the groundwater model and determine if cleaning up the soil vapor is more effective than groundwater cleanup. The AF will continue to use the model to evaluate this scenario.

Continued SVE may be the optimal decision for mass removal at Site FT019c; but funding priority may be given to Site FT082 considering the residual TCE leachate concentrations at that location.

The USEPA asked if funding the model would be an issue in the future. The AF said it is a priority and will not be an issue.

# 4.0 Installation Restoration Program Operable Unit 4

#### Schedule for Proposed Plan and Record of Decision

The contract for the Proposed Plan and ROD was awarded on 17 March 2006. The Proposed Plan is scheduled for submission in August 2006 and the Draft ROD will be issued by May 2007. The AF is evaluating if the ROD can be completed sooner.

Sites included in the OU 4 Proposed Plan and ROD are all no further action sites. However, some of the closed skeet ranges may require institutional controls, which could complicate the ROD. State Land Use Controls are already in discussion for other bases, so these may be worked out soon. A date for the ROD public meeting has not been decided yet.

# 5.0 Installation Restoration Program Operable Unit 5

#### SVE Installation Update for Sites FT082 and SS083

The AF provided updated SVE installation schedules for Sites FT082 (CG070 source area burn pit) and SS083 (B 676). The AF is on track to complete SVE installation and start-up at both sites by the end of May 2006. The bid packages for both sites are out to bid and costs should be back in a couple of weeks. However, the TCE footprints are larger than originally programmed.

Furthermore, Federal Aviation Administration (FAA) regulations concerning design requirements for aircraft-rated vault box locations and the use of underground piping may negatively impact costs.

Removing mass from Site FT082 is a priority because of the significant TCE concentrations in soil gas at that location. Four SVE wells and five monitoring point (MP) wells will be installed at Site FT082. All wells will be nested and screens located at multiple depths. The MP wells will be constructed so they can be converted to SVE wells in the future, if necessary. The power source for the Site FT082 SVE system is off Perimeter Road; therefore, the AF will install the equipment closer to the power source and away from the runway. This location will make it easy for access and maintenance of the system, and minimize any impacts to the active runway.

The RWQCB inquired if the AF evaluated angled borings for the SVE and MP well installations. The AF evaluated angled borings and determined it was not cost-effective to install wells using the method.

If funding becomes an issue, because of the FAA requirements and expanded footprint, the AF may suggest delaying installation of the MPs in order to get the systems on-line and removing mass. The MPs could be installed at a later date when additional funding is available. However, it is the AF's goal to get the two systems at Sites FT082 and SS083 installed and extracting mass.

Site SS083 includes the installation of three SVE wells and five MP wells. The AF directed the LRA to pay for installation of the MP wells instead of replacing groundwater monitoring wells destroyed during construction of the new hangars. Installation of the wells was scheduled to start on 20 March 2006, but the LRA is having difficulties securing payment for the wells with their subcontractor.

The RWQCB wanted to know how the TCE groundwater plume would be monitored without replacing the groundwater monitoring wells. The AF stated the current OU 1 groundwater model domain will be expanded to include the OT069 area and will be used to develop the appropriate monitoring well network; a predictive numerical model will be needed to evaluate the TCE clean-up progress.

The USEPA stated biological transformation of the volatile organic compounds (VOCs) in OU 3 will likely diminish over time as the substrate is depleted. The AF agreed with this statement and stated the predictive groundwater model for the site will first consider the worse case scenario without biological transformation.

# 6.0 Compliance Sites

# Site ST067b Work Plan

The work plan for Site ST067b has been funded and the AF is on track to comply with the RWQCB request for submittal of the draft work plan by 1 June 2006.

# Additional SVE Wells at Sites ST054 and ST057

The Sites ST054 and ST057 SVE systems will be expanded using previously drilled wells that were never connected to the system. The expansion at Site ST054 will bring on two additional wells and Site ST057 will bring on three additional wells. These nested extraction wells should be operating at their respective sites by June 2006.

The RWQCB stated Compliance Site activities are reported to RWQCB executives monthly and any new reports submitted by the AF may raise the cleanup and abatement order issue. The RWQCB confirmed a cleanup and abatement order is the direction the board is pursuing for these sites.

#### Dieldrin Delineation Work Plan

The data gap analysis for the Dieldrin delineation work plan is funded; however, the work plan is not yet funded. The initial task includes compiling and analyzing all available data collected from AOC071 (Dieldrin in groundwater). The second phase will include summarizing all the data compiled and issuing a work plan to address the data gaps for the site. The AF needs to understand the data gaps in order to fully delineate Dieldrin in groundwater at AOC071 and obtain the necessary funding.

The AF informed the BCT a developer is considering building warehouses in the old housing area. The developer will be collecting 50 soil samples from underneath the former housing concrete slabs to determine how the soils would be managed and whether they will pursue this venture, with land use designated as commercial. At the direction of the AF, the developer is preparing a site work plan and will share the data when the work is completed.

The AF's conceptual site model for AOC071 is Dieldrin was applied beneath the concrete foundation slabs before construction of the housing area and applied around the foundations when construction was completed. The developer's program is designed to go through the living room floors of the former housing units to try to confirm a pattern of application.

The USEPA noted sampling beneath concrete slabs is not as easy as it sounds. The AF stated a similar effort, sample collection via concrete coring and hand augering, was previously completed in the housing area by the AF.

The developer is planning to be on-site in mid-April 2006, after responding and incorporating AF comments into their work plan. The developer's main objective is developing a strategy for soil management during construction.

The USEPA inquired about data quality and comparability to previous data collected by the AF. The AF confirmed the data will be of similar quality, but will only be considered screening level data and no AF decisions will be made from the data collected.

The USEPA asked how exposure risks will be managed if one of the workers gets violently ill during construction. The AF stated the developer is responsible for evaluating use of the area and their own health and safety. If the developer decides to construct on the site and the AF still

owns the property, the developer would have to approach the AF for approval (the AF still owns the property and the LRA has a long-term lease).

#### 7.0 Basewide

# **Program Strategy**

Recently the AF completed a bottom-up review of the GAFB project. The AF evaluated where we are, what we know, where we have to go, and what it will take to get us there. The AF produced a cost to complete for the project through 2013. The AF evaluated and added project requirements where they were missing from the current program. The AF determined project requirements for 2007 are twice the available funding. The AF looked at what projects could be moved to 2009 and 2010, when the agency is expected to get healthier. The AF is looking at possible trade-offs in order to prioritize funding and project requirements.

The RWQCB asked how project requirements were defined during the bottom-up review. The AF defined requirements as costs needed to operate and maintain treatment systems, sampling, reporting, decommissioning, carbon change-out, and legal drivers for a particular site. The evaluation accounts for the full life-cycle costs of a project. The AF's position is to use the modeling effort to prioritize efforts towards the greatest level of protection.

#### Path Forward

The AF's path forward includes the creation of OU 5 for VOC source area Sites FT082 and SS083. The AF will also prepare three separate CAPs for Compliance Sites, as follows:

- Flightline fueling systems (SS030, ST054, ST057, ST058, AOC081 [Rail Road Fueling System delivery and storage area], and AOC MW032)
- Sites ST067a and ST067b
- AOC071 (Dieldrin in groundwater).

The RWQCB requested a proposed schedule for the three CAPs so they can be worked into the cleanup and abatement order for the Compliance Sites. The RWQCB noted the initial question from RWQCB executives would be why is it taking so long. The AF is looking at schedule to complete and cost to complete for the CAPs. The AF's goal is to provide the schedules by the next BCT meeting.

The USEPA asked if the bottom-up review was part of the peer review this year. The AF stated it was not, but the assumptions will be peer reviewed.

#### Groundwater Modeling Strategy

The AF intends to use the basewide groundwater model to assist in making decisions over time. The OU 1 model will be completed and then expanded to other areas. The plan is to optimize the model grid size outside of OU 1 for the following:

OU 3 OT069

- Benzene and free product in groundwater
- Methyl tertiary-butyl ether at AOC MW032
- Dieldrin in groundwater
- Landfills.

The model would then be updated annually and the information integrated in the annual basewide monitoring reports. Model results would be used to make informed decisions and would assist in developing CAPs for the Compliance Sites.

The RWQCB asked if the AF has been able to divide the OU 3 OT069 and OU 1 TCE plumes. The AF's position is the models from OU 1 and OU 3 will help "tease out" the co-location of these plumes. With real data over time, the AF believes the model will have more accuracy and be a very useful tool. This holistic approach will enable the BCT to optimize sampling efforts. The model will also allow the AF to show the public we are being protective.

# **SVE START STOP Process**

The AF is proposing a basewide SVE START STOP process to evaluate whether an SVE system should be stopped. The AF would like to apply this process to all SVE systems at GAFB for consistency. The process is a tiered approach and involves the evaluation of the following four criteria.

# 1. Requirements to Initiate Process

- Site adequately characterized
- SVE system optimized
- Conceptual site model verified by performance monitoring
- Removal rates following rebound
  - Stable
  - Asymptotic

#### 2. Process

- Process goals
  - Evaluate SVE initiation or termination
  - Consider technical and economic factors
  - Use multiple lines of evidence to make professional judgment
- Work through questions to answer decision criteria
  - Exit the process at any step if the answer is no

#### 3. Sequential Decision Criteria

- Will vadose zone chemicals of concern reach ground water? If no, end evaluation
- Will contaminant concentrations in leachate be above the ground water cleanup goals?
  If no, end evaluation
- Is it appropriate to initiate or terminate SVE?

#### 4. Cost Evaluation

- Input vadose zone information into groundwater model
- Compare aguifer cleanup times with and without leachate addition
- Compare continued SVE costs
- Compare extended groundwater treatment costs

The RWQCB asked if this process was used as part of the decision to discontinue closure procedures at Sites FT019a and FT019c. The AF confirmed the evaluation was used and results indicated the sites were not ready for closure.

The USEPA asked how Site FT019a looked. The AF reviewed the data for the closure report and it was apparent the site wasn't ready for closure.

The USEPA and RWQCB feel an evaluation of upward risk and indoor air intrusion is a missing component of the process. The AF is assuming the pathway is broken at the surface and therefore it is not a concern.

The AF stated optimization is also part of the decision process: evaluating how a source can be reduced. The AF will look at ways to cost-effectively reduce leachate migration into the groundwater. Optimization will be done on a continuing basis.

The USEPA asked if the process has provisions for VOCs to rise through the capillary fringe and recontaminate the soil. The AF stated a University of Waterloo study did not support recontamination from groundwater away from the source area.

The USEPA stated this START STOP process is vintage 1999 and wanted to know if there are any site histories available for review. The AF has successfully implemented a similar process at both Mather and Castle Air Force Bases and has histories available for review. The AF wanted to get this process on the table now for discussion because a process is needed.

#### **Next BCT Meeting**

The AF proposed having a site visit at GAFB during the next BCT meeting, and especially for the modelers. The USEPA and RWQCB both agreed a site visit would be valuable.

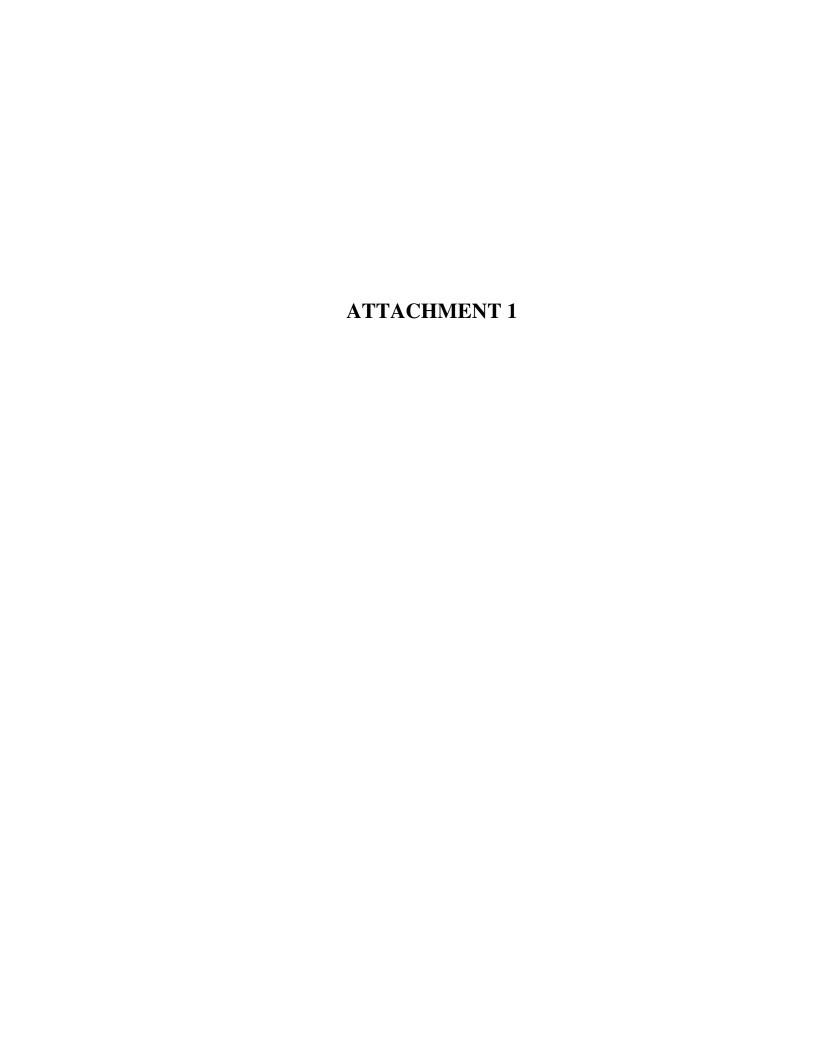
The next BCT meeting will be at the GAFB field office in Victorville, California. A morning BCT meeting will be held on 16 May 2006, followed by a site visit in the afternoon. The groundwater working session will be held the following day on 17 May 2006.

The USEPA asked if it would be possible to have additional visitors, from local Native American tribes, observe the split groundwater sampling effort in April 2006. The AF has no issues with additional visitors at the site during the sampling effort.

# 8.0 Recap Action Items

Action items were recapped and are included as **Attachment 4**.

The meeting was adjourned.



# George AFB **BCT Meeting**

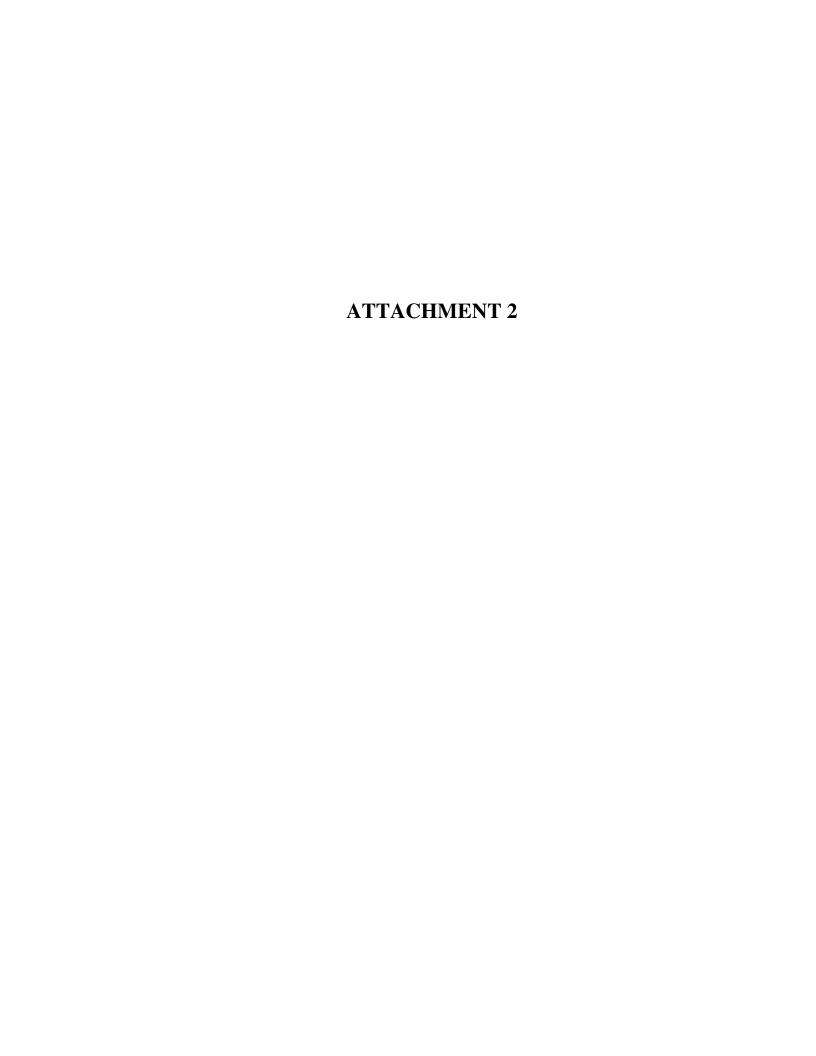
# 21 March 2006

**Sign-In and Contact List** 

Cell/FAX Number E-Mail Address **Phone Number** AFRPA/Western Regional Execution Center 3411 Olson Street, McClellan, CA 95652-1003 William.Harris@afrpa.pentagon.af.mil (800) 655-7200 x225 (916) 643-5880 (f) William Harris, Ph.D., P.E. dale. Vandagrift@ afra. pentagon. at. mi) 643-6420 Dale Vandagriff 18374 Phantom West Street, Victorville, CA 92392 George Field Office (760) 246-3315 (f) (760) 246-5360 3300 Sidney Brooks, Brooks City-Base, TX 78235-5112 HQ AFCEE/BCW (210) 536-3609 (f) jerry.bingham@brooks.af..mil (210) 536-4002 Jerry Bingham, P.E. Mail Stop SFD8-1, 9th Floor; 75 Hawthorne Street; San Francisco, CA U.S. EPA, Region IX 94105 chang.james@epamail.epa.gov (415) 972-3193 (415) 947-3526 (f) James Chang bruck.glenn@epamail.epa.gov (415) 972-3060 (415) 947-3526 (f) GGlenn Bruck California RWQCB, Lahonton Region 14440 Civic Drive, Suite 200, Victorville, CA 92392 (760) 241-2434 (760) 241-7308 (f) jcass@waterboards.ca.gov Jehiel (Jay) Cass. P.E. 90 New Montgomery Street, Suite 1010, San Francisco, CA 94105 TechLaw, Inc. (415) 281-8735 (f) bmabey@techlawinc.com (415) 281-8730/24 Bill Mabey, Ph.D. ibalkissoon@techlawinc.com (415) 281-8730/14 (415) 281-8735 (f) Indira Balkissoon, 18374 Phantom West Street, Victorville, CA 92394-1504 Booz Allen Hamilton, Inc. cox calvin@bah.com (909) 553-3792 (c) (760) 246-5360 Calvin Cox 4610 Fox Road, Cascade, CO 80809 Mitretek Systems (719) 684-0923 (f) ssoloyan@mitretek.com (719) 684-0924 Susan Soloyanis, Ph.D., P.G. (916) 643-6420 x2x2 238 McClellan Office 3347 Michelson Drive, Suite 200, Irvine, CA 92612 Shaw Environmental, Inc. (805) 390-2917 (c) david.daftary@shawgrp.com (805) 499-3159 David Daftary, P.G., C.H.G. 1340 Treat Boulevard, Suite 300, Walnut Creek, CA 94597 Montgomery Watson Harza Kurt Condie, P.E. kurt.condie@us.mwhglobal.com (805) 450-8410 (c) (805) 560-7214 gilbert.dimidjian@us.mwhglobal.com Gilbert Dimidjian (925) 975-3568 (510) 367-4500 (c) Sandra Ross, P.G. sandralross@sbcglobal.net (916) 947-7637 (c) (530) 888-5801 (SRL Consulting) 4600 Northgate Boulevard, Suite 207, Sacramento, CA 95834 HydroGeoLogic, Inc. (916) 501-1562 (c) ipalmer@hgl.com (916) 614-8770 Joshua Palmer 2000 Powell Street, Suite 1180, Emeryville, CA 94608 Malcolm Pirnie wmcclellan@pirnie.com (510) 593-6706 (c) (510) 735-3044 Wendy McClellan, P.G. 1900 Powell Street, Suite 250, Emeryville, CA 94608 E2 engineering chip.poalinelli@e2.com (510) 332-5958 (c) (510) 428-4728 Chip Poalinelli 2485 NATOULTSECHOFACE DZ Sacranento, CX 95833.2937 CHZMHill

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# Base Realignment and Closure Cleanup Team Meeting Minutes Former George Air Force Base, California 14 February 2006

# **Attachment 4 – Decisions and Action Items**

No.	<u>Decisions</u>	Date Started	<b>Date Completed</b>
1.	Location of a third Lower Aquifer Well in OU 2 will be determined based on results of HCSM and OT-69 Investigation.	7/22/04	Pending
2.	Restart of the OU 1 GETS will be delayed until completion of groundwater modeling.	7/22/04	Pending

No.	RP	Action Items	Date Started	Date Completed/ Comments
321	MWH	Consider installation of piezometers near groundwater extraction conversion wells.	1/28/04	Defer until GW modeling and optimization completed
402	AF	Give a list and schedule of property transfer to BCT.	10/20/05	
404	AF	Send letter to LRA about the need for lining the golf course pond.	10/20/05	LRA verbally informed 6/14/05, 10/19/05
419	MWH	Forward a copy of the Castle AFB Start-Stop document to USEPA and RWQCB.	2/14/06	Completed, 2/27/06
420	AF	Provide a letter to RWQCB outlining how OU 2 CAPs will be addressed.	2/14/06	
421	AF	Provide a plan on how Dieldrin in groundwater will be addressed to the RWQCB and USEPA.	2/14/06	

Key:

AF Air Force AFB Air Force Base

BCT Base Realignment and Closure Cleanup Team GETS Groundwater Extraction and Treatment System

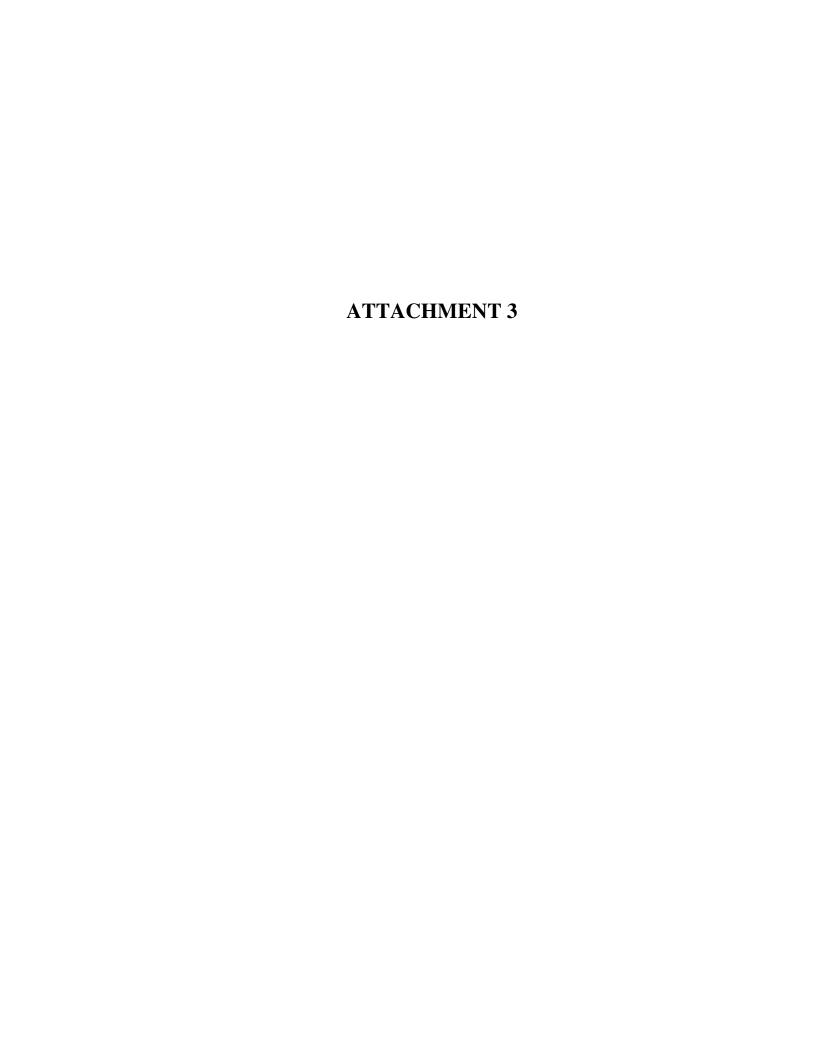
GW groundwater

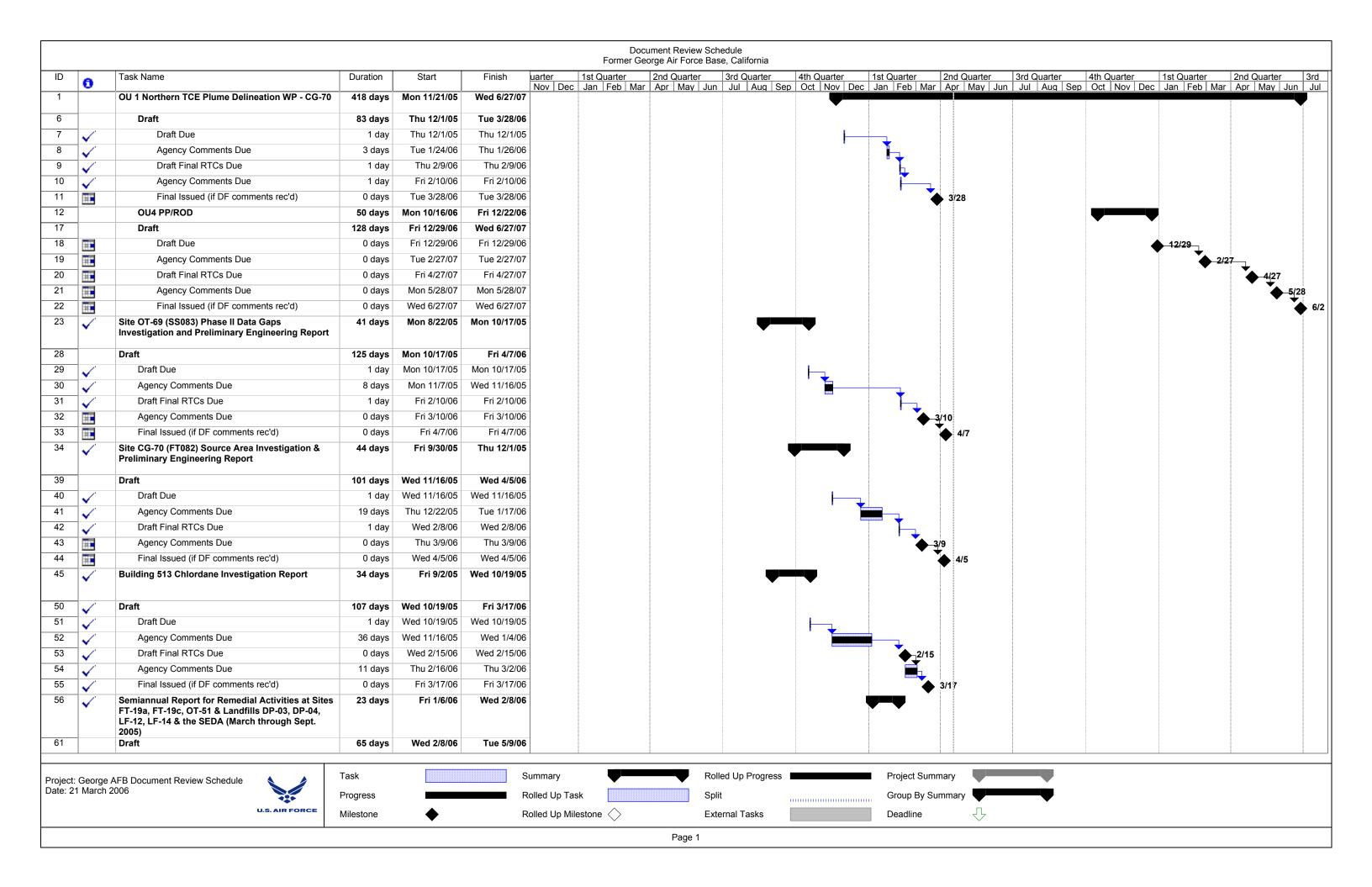
HCSM Hydrogeologic Conceptual Site Model

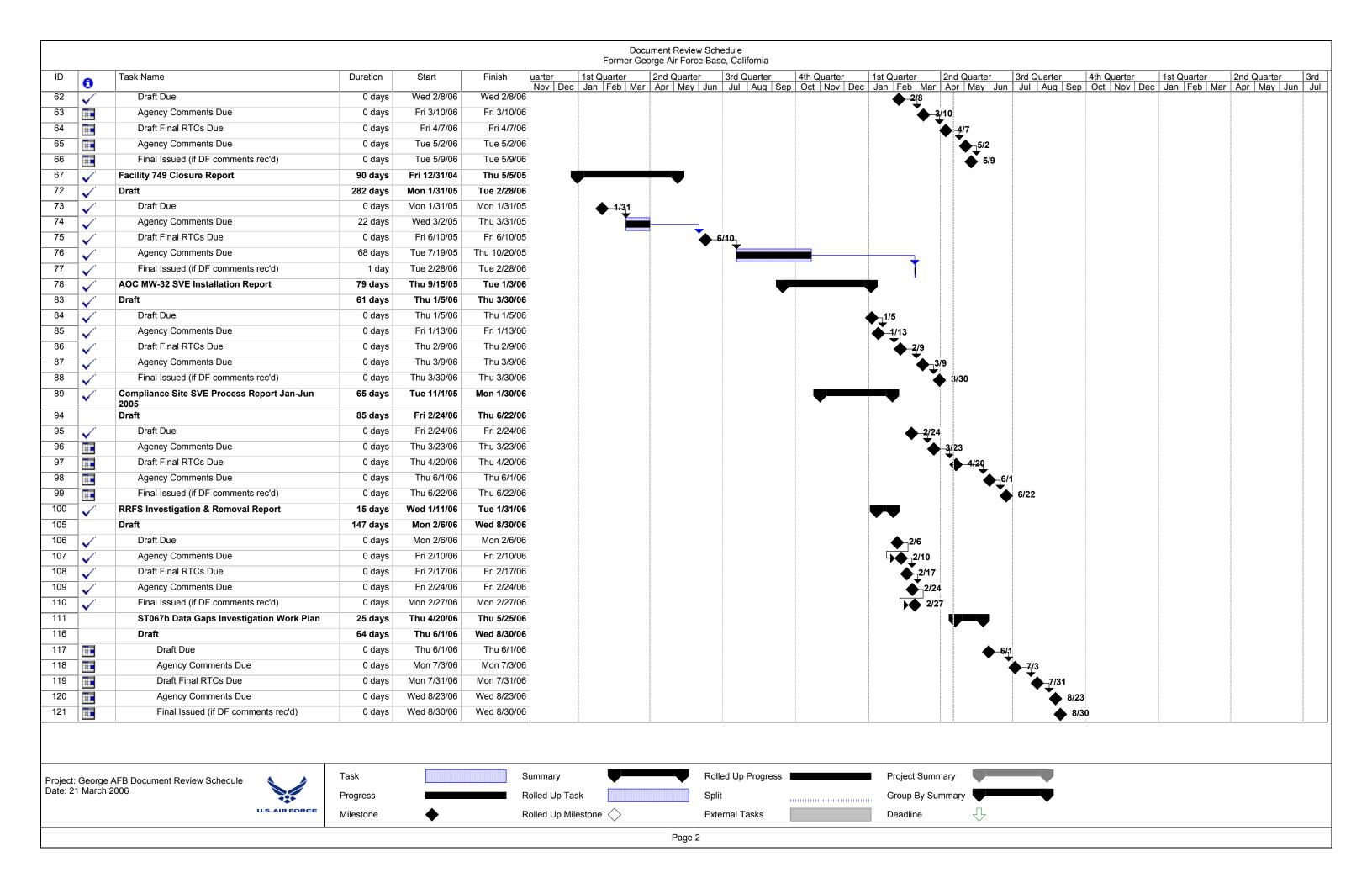
LRA Local Reuse Authority

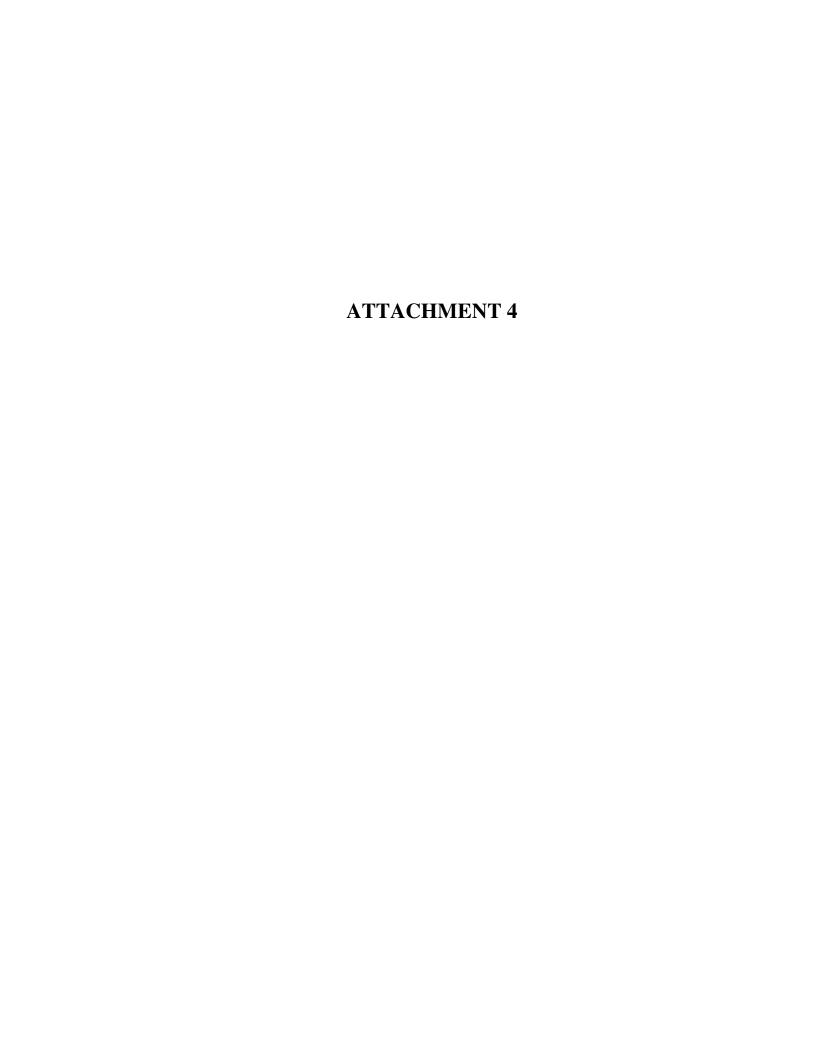
OU operable unit RP responsible party

RWQCB Regional Water Quality Control Board USEPA U.S. Environmental Protection Agency









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404	AF	Send letter to LRA about the need for lining the golf course pond.	10/20/05	LRA verbally informed 6/14/05, 10/19/05
420	AF	Provide a letter to RWQCB outlining how Compliance Site CAPs will be addressed.	2/14/06	
422	AF	Provide USEPA and RWQCB tentative schedule for OU 5 ROD.	3/21/06	
423	AF	Provide USEPA and RWQCB a list of landfill wells that will be considered for sampling as part of OU 1.	3/21/06	Completed, 3/31/06
424	AF	Provide updated IRP table for BCT.	3/21/06	

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AF Air Force

BCT Base Realignment and Closure Cleanup Team

CAP Corrective Action Plan

GETS Groundwater Extraction and Treatment System

GW groundwater

HCSM Hydrogeologic Conceptual Site Model IRP Installation Restoration Program

LRA Local Reuse Authority

OU operable unit
ROD Record of Decision
RP responsible party

RWQCB Regional Water Quality Control Board USEPA U.S. Environmental Protection Agency